

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

First Class Mail and Periodicals
Service Standard Changes, 2021

Docket No. N2021-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO
INTERROGATORIES TO STEPHEN B. HAGENSTEIN
(APWU/USPS-T-3/1)
(May 19, 2021)

Pursuant to 39 CFR §3010.311, the American Postal Workers Union, AFL-CIO respectfully submits the following interrogatories to United States Postal Service witness Stephen Hagenstein (USPS-T-3).

Any part of these interrogatories may be re-directed to one or more other witness(es), or answered institutionally, as necessary. Instructions for responding to these interrogatories are set forth in AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES TO ROBERT CINTRON (APWU/USPS-T-1/1-4) and incorporated by reference here.

Please contact the undersigned with any questions.

Respectfully Submitted,

MURPHY ANDERSON PLLC

A handwritten signature in dark ink, appearing to be 'MH' followed by a long horizontal stroke, is positioned above a thin horizontal line.

Melinda Holmes, Esq.

Wes Turner, Esq.

1401 K Street NW, Suite 300

Washington, D.C. 20005-4126

Tel.: (202) 223-2620

Fax: (202) 296-9600

mholmes@murphypllc.com

wturner@murphypllc.com

*Counsel for the American Postal Workers
Union, AFL-CIO*

APWU/USPS-T-3/1

In your testimony at page 24, you note that the service standard changes will affect urban and rural mail nearly equally.

(a) Identify each rural area by state and town/village/locality that falls within the following categories identified in the Request for Advisory Opinion:

- i. Rural areas in intra-SCF and inter-SCF First-Class Mail within the 48 contiguous states where the combined drive time between origin P&DCF, destination ADC, and destination SCF is more than three hours, but does not exceed 20 hours (changing to a three-day service standard).
- ii. Rural areas in inter-SCF First-Class Mail within the 48 contiguous states where the combined drive time between origin P&DCF, destination ADC, and destination SCF is more than 20 hours but does not exceed 41 hours (changing to a four-day service standard).
- iii. Rural areas in the contiguous 48 states where the drive time between origin P&DCF, destination ADC, and destination SCF exceeds 41 hours (changing to a five-day service standard).

(b) With regard to your answer to (a), above, identify the total number of “rural areas”, the total number of urban areas, and the percentage of “rural areas” as compared to the total of all areas, urban and rural, that will see a service standard change under the Postal Service’s proposal.